

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re application of: **Day et al.**

Serial No. 09/820,511

Filed: March 29, 2001

For: **Method, Apparatus and Program
for Magnifying the Text of a Link
While Still Retaining Browser
Function in the Magnified Display**

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Group Art Unit: 2176

Examiner: **Maikhanh Nguyen**

**Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450**

35525
PATENT TRADEMARK OFFICE
CUSTOMER NUMBER

AMENDED APPEAL BRIEF (37 C.F.R. 41.37)

This brief is in furtherance of the Notice of Reinstatement of Appeal, filed in this case on March 13, 2007.

No fees are believed to be necessary. If, however, any fees are required, I authorize the Commissioner to charge these fees which may be required to IBM Corporation Deposit Account No. 09-0447. No extension of time is believed to be necessary. If, however, an extension of time is required, the extension is requested, and I authorize the Commissioner to charge any fees for this extension to IBM Corporation Deposit Account No. 09-0447.

REAL PARTY IN INTEREST

The real party in interest in this appeal is the following party: International Business Machines Corporation of Armonk, New York.

RELATED APPEALS AND INTERFERENCES

With respect to other appeals or interferences that will directly affect, or be directly affected by, or have a bearing on the Board's decision in the pending appeal, there are no such appeals or interferences.

STATUS OF CLAIMS

A. TOTAL NUMBER OF CLAIMS IN APPLICATION

Claims in the application are: 1, 2, 4-9, 11-13, 15-20, 22-26.

B. STATUS OF ALL THE CLAIMS IN APPLICATION

1. Claims canceled: 3, 10, 14, 21.
2. Claims withdrawn from consideration but not canceled: None.
3. Claims pending: 1, 2, 4-9, 11-13, 15-20, 22-26.
4. Claims allowed: None.
5. Claims rejected: 1, 2, 4-9, 11-13, 15-20, 22-26.
6. Claims objected to: None.

C. CLAIMS ON APPEAL

The claims on appeal are: 1, 2, 4-9, 11-13, 15-20, 22-26.

STATUS OF AMENDMENTS

A Final Office Action was mailed January 24, 2007. No response was filed. A Notice of Reinstatement of Appeal was filed March 13, 2007.

SUMMARY OF CLAIMED SUBJECT MATTER

A. CLAIM 1 - INDEPENDENT

The presently claimed invention in claim 1 provides a method for magnifying a portion of a document in a browser on a client (Specification, page 12, lines 18-20; page 22, lines 4-5 and Figure 9). The presently claimed invention presents a first document in a first display in the browser on the client (Specification, page 11, line 32-page 12, line 1; page 22, lines 6-7) and generates a magnified display of the first document in memory at the client (Specification page 10, line 21-25; page 20, lines 3-7). The presently claimed invention displays a selected portion of the magnified display corresponding to a selected portion of the first document in a second display in the browser (Specification, page 12, lines 18-20; page 14, lines 30-31; page 17, lines 20-22; page 22, lines 8-9; and Figure 9, item 904). The presently claimed invention maps the selected portion of the magnified display to a display space of the selected portion of the first document (Specification, page 3, lines 6-7; page 10, lines 25-27; page 14, line 32-page 15, line 2; page 22, lines 22-25; Figure 9, item 912) and performs an action with respect to the first document in response to receiving a request for the action within the second display, (Specification, page 3, lines 7-13; page 10, lines 27-31; page 12, lines 20-23; page 17, line 24-page 18, line 5; page 22, lines 12-13; and Figure 9, items 914-918).

B. CLAIM 8 - INDEPENDENT

The presently claimed invention in claim 8 provides a method for magnifying a portion of a document in a browser (Specification, page 12, lines 18-20; page 22, lines 4-5 and Figure 9). The presently claimed invention presents a first document in a first display in the browser (Specification, page 11, line 32-page 12, line 1; page 22, lines 6-7) and receives a selection of a portion of the first document (Specification, page 19, lines 8-11; page 24, lines 1-5). The presently claimed invention generates a magnified display of the selected portion from the structure of the first document (Specification page 10, line 21-25; page 20, lines 3-7). The presently claimed invention analyzes a document object model for the first document (Specification, page 3, lines 13-17; page 15, lines 25-30). The presently claimed invention identifies a portion of the document object model that corresponds to the selected portion of the first document (Specification, page 16,

lines 16-24; Figure 9, item 904). The magnified display of the selected portion of the first document is generated at a client based on the corresponding portion of the document object model for the first document (Specification, page 3, lines 13-17; page 16, lines 16-18; Figure 3; Figure 10, item 1010). The presently claimed invention presents the magnified display (Specification, page 12, lines 18-20; page 23, line 28; Figure 5, item 550; Figure 6, item 618; Figure 7, item 725), receives a request for an action within the magnified display, and performs the action with respect to the magnified display (Specification, page 3, lines 7-13; page 10, lines 27-31; page 12, lines 20-23; page 17, line 24-page 18, line 5; page 22, lines 12-13; and Figure 9, items 914-918).

C. CLAIM 12 - INDEPENDENT

The presently claimed invention of claim 12 provides an apparatus for magnifying a portion of a document in a browser (Specification, page 12, lines 18-20; page 22, lines 4-5; Figure 3; and Figure 9). The apparatus comprises first presentation means for presenting a first document in a first display in the browser on a client (Specification, page 11, line 32-page 12, line 1; page 22, lines 6-7; Figure 1, item 108; Figure 6, item 618). Generating means are provided for generating a magnified display of the first document in memory at the client (Specification page 10, line 21-25; page 20, lines 3-7; Figure 1, item 110; Figure 7, item 712). Displaying means are provided for displaying a selected portion of the magnified display corresponding to a selected portion of the first document in a second display in the browser (Specification, page 12, lines 18-20; page 14, lines 30-31; page 17, lines 20-22; page 22, lines 8-9; and Figure 9, item 904). The apparatus provides mapping means for mapping the selected portion of the magnified display to a display space of the selected portion of the first document (Specification, page 3, lines 6-7; page 10, lines 25-27; page 14, line 32-page 15, line 2; page 22, lines 22-25; Figure 7, item 730; Figure 9, item 912) and performing means for, in response to receiving a request for an action within the second display, performing the action with respect to the first document (Specification, page 3, lines 7-13; page 10, lines 27-31; page 12, lines 20-23; page 17, line 24-page 18, line 5; page 22, lines 12-13; and Figure 9, items 914-918). The means recited in independent claim 12 may be data processing hardware within server 200 in Figure 2 or client 300 in Figure 3, and combinations thereof, as

described in the specification at page 7, line 6, to page 10, line 20, operating under control of software performing with the functionality described in the specification at page 16, line 29, to page 19, line 32, or equivalent.

D. CLAIM 19 - INDEPENDENT

The presently claimed invention of claim 19 provides an apparatus for magnifying a portion of a document in a browser (Specification, page 12, lines 18-20; page 22, lines 4-5; Figure 3; and Figure 9). The apparatus provides first presentation means for presenting a first document in a first display in the browser (Specification, page 11, line 32-page 12, line 1; page 22, lines 6-7; Figure 1, item 108; and Figure 6, item 618), first receipt means for receiving a selection of a portion of the first document (Specification, page 19, lines 8-11; page 24, lines 1-5; Figure 1, item 108; Figure 3), and magnification means for generating a magnified display of the selected portion from the structure of the first document (Specification page 10, line 21-25; page 20, lines 3-7; Figure 7, item 712). The apparatus also provides analysis means for analyzing a document object model for the first document (Specification, page 3, lines 13-17; page 15, lines 25-30; Figure 1, item 108; Figure 3, item 302) and identification means for identifying a portion of the document object model that corresponds to the selected portion of the first document (Specification, page 16, lines 16-24; Figure 1, item 108; Figure 3, item 302; Figure 9, item 904). The magnified display of the selected portion of the first document is generated at a client based on the corresponding portion of the document object model for the first document (Specification, page 3, lines 13-17; page 16, lines 16-18; Figure 3; Figure 10, item 1010). Second presentation means are provided by the apparatus for presenting the magnified display (Specification, page 12, lines 18-20; page 23, line 28; Figure 5, item 550; Figure 6, item 618; Figure 7, item 725). The presently claimed invention provides second receipt means for receiving a request for an action within the magnified display, and performing means for performing the action with respect to the magnified display (Specification, page 3, lines 7-13; page 10, lines 27-31; page 12, lines 20-23; page 17, line 24-page 18, line 5; page 22, lines 12-13; and Figure 9, items 914-918). The means recited in independent claim 19 may be data processing hardware within server 200 in **Figure 2**

or client 300 in **Figure 3**, and combinations thereof, as described in the specification at page 7, line 6, to page 10, line 20, operating under control of software performing with the functionality described in the specification at page 16, line 29, to page 19, line 32, or equivalent.

E. CLAIM 23 - INDEPENDENT

The presently claimed invention of claim 23 provides a computer program product, in a tangible computer readable storage medium, for magnifying a portion of a document in a browser (Specification, page 12, lines 18-20; page 22, lines 4-5; page 20, line 23-page 21, line 1; and Figure 9). The presently claimed invention provides instructions for presenting a first document in a first display in the browser on a client (Specification, page 11, line 32-page 12, line 1; page 22, lines 6-7), instructions for generating a magnified display of the first document in a memory at the client (Specification page 10, line 21-25; page 20, lines 3-7), and instructions for displaying in a second display in the browser a selected portion of the magnified display corresponding to a selected portion of the first document (Specification, page 12, lines 18-20; page 14, lines 30-31; page 17, lines 20-22; page 22, lines 8-9; and Figure 9, item 904). The presently claimed invention provides instructions for mapping the selected portion of the magnified display to a display space of the selected portion of the first document (Specification, page 3, lines 6-7; page 10, lines 25-27; page 14, line 32-page 15, line 2; page 22, lines 22-25; Figure 9, item 912). The presently claimed invention provides instructions for performing the action with respect to the first document in response to receiving a request for an action within the second display (Specification, page 3, lines 7-13; page 10, lines 27-31; page 12, lines 20-23; page 17, line 24-page 18, line 5; page 22, lines 12-13; and Figure 9, items 914-918).

F. CLAIM 25 - INDEPENDENT

The presently claimed invention of claim 25 provides a computer program product, in a computer readable storage medium, for magnifying a portion of a document in a browser (Specification, page 12, lines 18-20; page 22, lines 4-5; page 20, line 23-page 21, line 1; and Figure 9). The presently claimed invention comprises instructions for presenting a first document in a first display in the browser (Specification, page 11, line 32-page 12, line 1; page 22, lines 6-7) and instructions for receiving a selection of a portion of the first document (Specification, page 19,

lines 8-11; page 24, lines 1-5). The presently claimed invention provides instructions for generating a magnified display of the selected portion from the structure of the first document (Specification page 10, line 21-25; page 20, lines 3-7). The presently claimed invention provides instructions for analyzing a document object model for the first document (Specification, page 3, lines 13-17; page 15, lines 25-30) and instructions for identifying a portion of the document object model that corresponds to the selected portion of the first document (Specification, page 16, lines 16-24; Figure 9, item 904). The magnified display of the selected portion of the first document is generated at a client based on the corresponding portion of the document object model for the first document (Specification, page 3, lines 13-17; page 16, lines 16-18; Figure 3; Figure 10, item 1010). The presently claimed invention provides instructions for presenting the magnified display (Specification, page 12, lines 18-20; page 23, line 28; Figure 5, item 550; Figure 6, item 618; Figure 7, item 725) and instructions for receiving a request for an action within the magnified display, and instructions for performing the action with respect to the magnified display.

G. CLAIM 2 DEPENDENT

The presently claimed invention of claims 2 provides the method of claim 1 in which the action comprises a selection of a link within the magnified portion (Specification at page 17, lines 24-32; Figure 9, items 912-914). The performing means comprises means for retrieving and displaying a second document corresponding to the link in the first display (Specification, page 17, lines 11-16, and Figure 9, item 908). The means recited in dependent claim 2 may be data processing hardware within server 200 in Figure 2 or client 300 in Figure 3, and combinations thereof, as described in the specification at page 7, line 6, to page 10, line 20, operating under control of software performing with the functionality described in the specification at page 17, line 20, to page 19, line 24, or equivalent.

H. CLAIM 4 - DEPENDENT

The presently claimed invention of claim 4 provides the method of claim 1 in which the mapping means for mapping the magnified display to a display space comprises means for mapping the magnified portion to the first document to form an imagemap (Specification, page 14, line 32-page 15, line 2; page 17, line 20-line 24; Figure 7, item 730; Figure 9, item 912). The means

recited in dependent claim 4 may be data processing hardware within server **200** in **Figure 2** or client **300** in **Figure 3**, and combinations thereof, as described in the specification at page 7, line 6, to page 10, line 20, operating under control of software performing with the functionality described in the specification at page 16, line 29, to page 18, line 15, or equivalent.

I. CLAIM 5-DEPENDENT

The presently claimed invention provides the method of claim 1 in which the step of generating a magnified display of the first document comprises creating the second display (Specification at page 14, lines 21-26, page 17, lines 20-26, page 19, lines 8-11, Figure 9, item 910-912, Figure 10, item 1010). The second display has a magnified display space based on a magnification factor. (Specification, page 15, lines 2-12, page 25, lines 18-21). The presently claimed invention reads pixels from video memory for the magnified portion in a normal display space for the original first document; and populating pixels in the second display to form a magnified display. (Specification, page 14, line 22-page 15, line 24).

J. CLAIM 6-DEPENDENT

The presently claimed invention provides the method of claim 5 in which the step of populating pixels in the second display comprises populating adjacent pixels based on the magnification factor for each pixel of the normal display space. (Specification, page 14, line 22-page 15, line 24).

K. CLAIM 7-DEPENDENT

The presently claimed invention provides the method of claim 5 in which the step of mapping the magnified display to a display space comprises mapping a magnified display space for the magnified portion to corresponding pixels in a normal display space for the original first document. (Specification, page 14, line 22-page 15, line 24).

L. CLAIM 9-DEPENDENT

The presently claimed invention provides the method of claim 8 in which the action comprises a selection of a link within the magnified display. (Specification, page 17, lines 26-32,

Figure 9, item 916). The step of performing the action comprises retrieving and displaying a second document corresponding to the link in the first display. (Specification, page 18, lines 1-5, Figure 9, item 920).

M. CLAIM 11-DEPENDENT

The presently claimed invention in claim 11 provides the method of claim 8 in which the presently claimed invention adjusts attributes of nodes in the portion of the document object model based on a magnification factor. (Specification, page 16, line 6-line 28, and Figure 8).

N. CLAIM 13-DEPENDENT

The presently claimed invention of claim 13 provides the apparatus of claim 12 in which the action comprises a selection of a link within the magnified portion (Specification at page 17, lines 24-32; Figure 9, items 912-914). The performing means comprises means for retrieving and displaying a second document corresponding to the link in the first display (Specification, page 17, lines 11-16, Figure 3, Figure 6, and Figure 9, item 908). The means recited in dependent claim 13 may be data processing hardware within server **200** in **Figure 2** or client **300** in **Figure 3**, and combinations thereof, as described in the specification at page 7, line 6, to page 10, line 20, operating under control of software performing with the functionality described in the specification at page 16, line 29, to page 19, line 32, or equivalent.

O. CLAIM 15 - DEPENDENT

The presently claimed invention of claim 15 provides the apparatus of claim 12 in which the mapping means for mapping the magnified display to a display space comprises means for mapping the magnified portion to the first document to form an imagemap (Specification, page 14, line 32-page 15, line 2; page 17, line 20-line 24; Figure 7, item 730; Figure 9, item 912). The means recited in dependent claim 15 may be data processing hardware within server **200** in **Figure 2** or client **300** in **Figure 3**, and combinations thereof, as described in the specification at page 7, line 6, to page 10, line 20, operating under control of software performing with the functionality described in the specification at page 16, line 29, to page 18, line 15, or equivalent.

P. CLAIM 16 - DEPENDENT

The presently claimed invention of claim 16 provides the apparatus of claim 12 in which the generating means comprises creation means for creating the second display (Specification at page 14, lines 21-26, page 17, lines 20-26, page 19, lines 8-11, Figure 9, item 910-912, Figure 10, item 1010). The second display has a magnified display space based on a magnification factor (Specification, page 15, lines 2-12, and page 25, lines 18-21). The presently claimed invention provides reading means for reading pixels from video memory for the magnified portion in a normal display space for the first original document, and population means for populating pixels in the second display to form a magnified display. (Specification, page 14, line 22-page 15, line 24). The means recited in dependent claim 16 may be data processing hardware within server **200** in **Figure 2** or client **300** in **Figure 3**, and combinations thereof, as described in the specification at page 7, line 6, to page 10, line 20, operating under control of software performing with the functionality described in the specification at page 16, line 29, to page 19, line 32, or equivalent.

Q. CLAIM 17 - DEPENDENT

The presently claimed invention of claim 17 provides the apparatus of claim 16 in which the population means provides means for populating adjacent pixels based on the magnification factor for each pixel of the normal display space. (Specification, page 14, line 22-page 15, line 24). The means recited in dependent claim 17 may be data processing hardware within server **200** in **Figure 2** or client **300** in **Figure 3**, and combinations thereof, as described in the specification at page 7, line 6, to page 10, line 20, operating under control of software performing with the functionality described in the specification at page 14, line 22 to page 16, line 5, or equivalent.

R. CLAIM 18 - DEPENDENT

The presently claimed invention of claim 18 provides the apparatus of claim 16 in which the mapping means provides means for mapping pixels in the magnified display space to corresponding pixels in the normal display space. (Specification, page 14, line 22-page 15, line 24). The means recited in dependent claim 18 may be data processing hardware within server **200** in **Figure 2** or client **300** in **Figure 3**, and combinations thereof, as described in the specification at page 7, line 6, to page 10, line 20, operating under control of software performing with the

functionality described in the specification at page 14, line 22 to page 16, line 5, and page 16, line 29, to page 19, line 32, or equivalent.

S. CLAIM 20 - DEPENDENT

The presently claimed invention of claim 20 provides the apparatus of claim 19 in which the action comprises a selection of a link within the magnified display (Specification, page 17, lines 26-32, Figure 9, item 916). The performing means provides means for retrieving and displaying a second document corresponding to the link in the first display. (Specification, page 18, lines 1-5, Figure 9, item 920). The means recited in dependent claim 20 may be data processing hardware within server **200** in **Figure 2** or client **300** in **Figure 3**, and combinations thereof, as described in the specification at page 7, line 6, to page 10, line 20, operating under control of software performing with the functionality described in the specification at page 16, line 29, to page 19, line 32, or equivalent.

T. CLAIM 22 – DEPENDENT

The presently claimed invention of claim 22 provides the apparatus of claim 19 in which adjustment means are provided for adjusting attributes of nodes in the portion of the document object model based on a magnification factor. (Specification at page 16, line 6-line 28, and Figure 8). The means recited in dependent claim 22 may be data processing hardware within server **200** in **Figure 2** or client **300** in **Figure 3**, and combinations thereof, as described in the specification at page 7, line 6, to page 10, line 20, operating under control of software performing with the functionality described in the specification at page 16, line 6, to page 19, line 32, or equivalent.

U. CLAIM 24-DEPENDENT

The presently claimed invention of claims 24 provides the computer program product of claim 23 in which the action comprises a selection of a link within the magnified portion and the performing means comprises means for retrieving and displaying a second document corresponding to the link in the first display (Specification, page 17, lines 11-16 and Figure 9, item 908).

V. CLAIM 26-DEPENDENT

The presently claimed invention provides the computer program product of claim 25 in which the action comprises a selection of a link within the magnified display. (Specification, page 17, lines 26-32, Figure 9, item 916). The presently claimed invention also provides instructions for performing the action comprises instructions for retrieving and displaying a second document corresponding to the link in the first display. (Specification, page 18, lines 1-5, Figure 9, item 920).

GROUND OF REJECTION TO BE REVIEWED ON APPEAL

The grounds of rejection to review on appeal are as follows:

1. Whether claims 1-2, 4, 12-13 and 23-24 are anticipated by *Gross et al.*, Method and System for Efficiently managing the Manipulation of Large Documents Displayed Within a Computer Screen, U.S. Patent No. 6,044,385, dated March 28, 2000 (hereafter referred to as "*Gross*") under 35 U.S.C. § 102(b);
2. Whether claims 5-7 and 16-18 are obvious over *Gross* in view of *Guedalia*, Method and System for HTML-Driven Interactive Image Client, U.S. Patent No. 6,121,970, dated September 19, 2000 (hereafter referred to as "*Guedalia*") under 35 U.S.C. § 103(a); and
3. Whether claims 3-9, 11, 19-20, 22 and 25-26 are obvious over *Gross* in view of *Szepesvary et al.*, Methods and Apparatus for Grammar-Based Recognition of User-Interface Objects in HTML Applications, U.S. Patent Application Publication No. 2003/0192026, published October 9, 2003 (hereafter referred to as "*Szepesvary*") under 35 U.S.C. 103(a).

ARGUMENT

A. 35 U.S.C. § 102, Alleged Anticipation, Claims 1-2, 4, 12-13, and 23-24

The Examiner rejects claims 1-2, 4, 12-13, and 23-24 under 35 U.S.C. § 102 as being allegedly anticipated by Gross et al. (US 6,044,385, issued 03/28/2000). The rejection is respectfully traversed.

A.1. Claims 1, 12, and 23

A prior art reference anticipates the claimed invention under 35 U.S.C. § 102 only if every element of a claimed invention is identically shown in that single reference, arranged as they are in the claims. *In re Bond*, 910 F.2d 831, 832, 15 U.S.P.Q.2d 1566, 1567 (Fed. Cir. 1990). All limitations of the claimed invention must be considered when determining patentability. *In re Lowry*, 32 F.3d 1579, 1582, 32 U.S.P.Q.2d 1031, 1034 (Fed. Cir. 1994). Anticipation focuses on whether a claim reads on the product or process a prior art reference discloses, not on what the reference broadly teaches. *Kalman v. Kimberly-Clark Corp.*, 713 F.2d 760, 218 U.S.P.Q. 781 (Fed. Cir. 1983). In this case, each and every feature of independent claims 1 is not identically shown in the cited reference, arranged as they are in the claim 1.

Independent claim 1 recites as follows:

1. A method for magnifying a portion of a document in a browser on a client, comprising:
 - presenting a first document in a first display in the browser on the client;
 - generating a magnified display of the first document in memory at the client;
 - displaying in a second display in the browser a selected portion of the magnified display corresponding to a selected portion of the first document;
 - mapping the selected portion of the magnified display to a display space of the selected portion of the first document; and
 - responsive to receiving a request for an action within the second display, performing the action with respect to the first document.

Independent claims 12 and 23 recite similar subject matter. *Gross* does not teach magnifying a portion of a document in a browser on the client. *Gross* also fails to disclose the generating, displaying, and mapping steps recited in independent claim 1.

Magnifying a portion of a document

Gross does not teach “magnifying a portion of a document in a browser on a client,” as recited in claim 1. The Examiner cites to *Gross* at column 3, lines 53-57 and the Abstract as disclosing magnifying a portion of a document. *Gross* teaches as follows:

A method and system for efficiently managing the manipulation of documents too large to be legibly displayed within a computer screen. Initially, a window is provided within which only a portion of an entire document may be displayed legibly. A graphic representation of the entire document is then exhibited within the window. A portion of the graphic representation of the entire document is displayed as a human discernable representation. A remaining portion of the graphic representation of the entire document is displayed as a compressed representation of a portion of the document. The compressed representation is iconic in nature such that a representation nearest the bottom and the top of the document, and furthest away from the human discernable portion, appears as increasingly iconic characters or graphics. The graphic representation itself is composed of a lens bar that allows a user to interpret an entire document displayed within a computer screen at one time on a global scale, while providing the user with an enlarged view of a local area of interest.

Gross, Abstract.

Here, *Gross* discloses displaying documents that are too large to be legibly displayed on a computer screen. In order to display the entire document on the screen, only a portion of the document is displayed legibly in a normal view. The rest of the document is displayed as a **compressed representation** or decreasing size. Although *Gross* describes the legible portion of the display as an "enlarged view," *Gross* does not teach magnifying any part of the document. To the contrary, *Gross* teaches **compressing** the document so that more of the document can be displayed on the computer screen. Thus, rather than disclosing magnifying a portion of a document as is recited in claim 1, *Gross* teaches compressing or decreasing the size of a document.

Gross states as follows:

Lens bar 130 thus offers the user a global sense of where the user is located within a long document that does not normally fit entirely within a window such as window 105. A rendering of the entire sample document 132, however, is depicted within window 105. Only a certain number of local lines or number of pixels in the case of a bit-mapped image are displayed "full size" or via a normal view as depicted at lens portion 134. Everything after this localized view is displayed within lens bar 130 in ever decreasing size and height, either continuously or at discrete intervals. Thus, information furthest from the localized view appear the smallest to a user.

Gross, column 10, lines 1-12.

As described above, *Gross* displays a long document that does not fit within a window by displaying only a portion of the document at the full size or normal view. The rest of the document is displayed in **ever decreasing size** and height so that information farthest from the lens portion will appear **smallest** to the user rather than magnifying the first document.

The Examiner also cites to the portion of *Gross* which states:

The graphic representation itself is composed of a lens bar that allows a user to interpret an entire document displayed within a computer screen at one time on a global scale, while providing the user with an enlarged view of a local area of interest.

Gross, column 3, lines 53-57.

As shown in this section of *Gross*, a lens bar allows a user to view an entire document displayed within a computer screen at one time on a global scale by decreasing the size of the document. *Gross* provides a normal view of a selected portion of the document that is legible to the user. Although *Gross* describes the normal view as an enlarged view of a local area of interest, the lens portion is described as enlarged in relation to the compressed or reduced size of the rest of the document. *Gross* describes compressing the rest of the document. When taken in context, the "enlarged portion" of the document described in *Gross* is the normal document view rather than a magnified portion of the document. The normal view of the document is only enlarged as compared to the portion of the display that is compressed or of ever decreasing size. Thus, *Gross* fails to teach "magnifying a portion of a document in a browser on a client. Quite the contrary, *Gross* teaches compressing or decreasing the size of a portion of a document.

Generating a magnified display of the first document

Gross fails to teach "generating a magnified display of the first document in memory at the client," as is recited in amended independent claim 1. The Examiner believes this feature is disclosed by *Gross* at column 8, lines 47-49 and Figure 7. The cited portion of *Gross* is included in the following section:

Note that the term "web page" can be distinguished from "pages" contained within a scrollable document such as sample document 123. Thus, sample document 123 can potentially include many individual "pages" within a single "web page." Only a portion of sample document 123 is actually displayed within window 104. Large portions remain unviewable because they are positioned "above" and "below" window 104. Window 104 essentially displays a portion of a viewable object (i.e., sample document 123) constructed from a mark-up language. One such mark-up language that can be utilized in accordance with the example presented in FIG. 6, is the Hypertext Mark-up Language (HTML). The size and position of elevator 120 within scroll bar 116 corresponds to the size and position of the current viewable page in relation to sample document 123. Sample document 123 can be accessed from a computer system contained within a computer network such as the Internet.

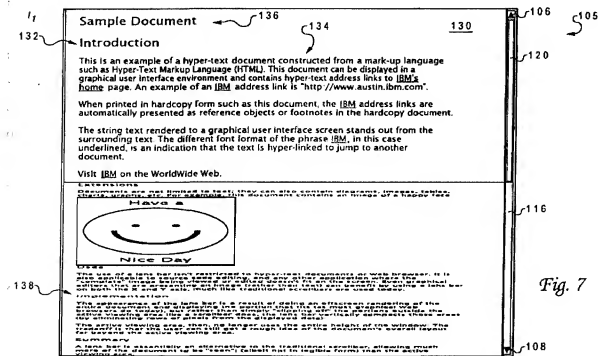
In the example of FIG. 6, because sample document 123 includes too many pages to view simultaneously, the user can position a mouse cursor over up-arrow section 106 or down-arrow section 108 of scroll bar 116 and click a pointing device (e.g., a mouse) to scroll the sample document 123 upward or downward, as appropriate. Scroll bar 116 thus provides a scrolling function. "Scrolling," well known in the art of graphical user interface icons, is the process of moving a document in a window such as window

104 to permit viewing of any desired portion. "Scrolling" is so named because it is the electronic equivalent of reading through a rolled or scrolled document rather than flipping through the pages of a book.

Gross, column 8, lines 43-60.

Here, Gross describes a scrollable document displayed in a window. The document is too large or too long to display the entire document in the window. So only a portion of the document is displayed or viewable within the window. Gross describes a scrollable document in which only a portion of the document is displayed in the window. A user can use the scroll bar to scroll through the document upward or downward to view the other portions of the document. This section of Gross only describes a scrollable document and has nothing to do with magnifying a portion of a document or generating a magnified display of a first document in memory at the client.

The Examiner also cites to Figure 7 which illustrates as follows:



Gross, Figure 7.

This figure shows a window with an entire document in the display. A normal view of a portion of the document is shown in a part of the window referred to as a lens portion. A user can read the text or graphics in the lens portion. The rest of the document is displayed in ever decreasing size and height so that the entire document can fit in the window. The portion of Gross describing Figure 7 states:

FIG. 7 depicts a lens bar 130 displayed within graphical user interface window 105 at an initial time in accordance with a preferred embodiment of the present invention. FIG. 7 illustrates lens bar 130 at time $t_{sub.1}$. A sample document 132 is displayed within window 105, which is analogous to window 104 of FIG. 6. Lens bar 130 overlays the entire body of sample document 132. The entire sample document 132 is actually displayed within window 105. A user can utilize scroll bar 116 to scroll lens portion 134 of lens bar 130 through sample document 132. A "normal" view of sample document 132 is indicated at lens portion 134. A user can clearly read text or graphics displayed within lens portion 134. Lens bar 130 also includes a top portion 136 and a bottom portion 138. The top portion 136 displays a beginning portion of sample document 132 and bottom portion 138 displays an ending portion of sample document 132.

Lens bar 130 thus offers the user a global sense of where the user is located within a long document that does not normally fit entirely within a window such as window 105. A rendering of the entire sample document 132, however, is depicted within window 105. Only a certain number of local lines or number of pixels in the case of a bit-mapped image are displayed "full size" or via a normal view as depicted at lens portion 134. Everything after this localized view is displayed within lens bar 130 in ever decreasing size and height, either continuously or at discrete intervals. Thus, information furthest from the localized view appear the smallest to a user.

Gross, column 9, line 52-column 10, line 12.

As shown above, the document displayed in Figure 7 is a long document that does not normally fit entirely within a window. Only a portion of the document is shown in a normal view. Everything after this view is displayed in ever decreasing size so that the entire document can fit in the window display. Thus, *Gross* teaches decreasing the size of a portion of a document so that a large document can fit in a window rather than generating a magnified display of the first document. Decreasing the size of a portion of the document and displaying another portion of the document at normal size does not teach generating a magnified display of a first document. Moreover, even if, *arguendo*, decreasing a portion of a document could disclose generating a magnified display, *Gross* teaches decreasing the size of only a portion of the document. *Gross* does not teach generating the compressed view of an entire first document in memory at the client. In addition, *Gross* does not state that the lens portion is a magnified display. To the contrary, *Gross* states that the lens portion is a normal view. And even assuming for the sake of argument that the lens portion is a magnified portion of the document, *Gross* does not provide any teachings regarding generating this magnified display. It is not inherent that a magnified portion of a document is displayed by generating a magnified display of the first document in memory at the client. Thus, *Gross* does not disclose "generating a magnified display of the first document in memory at the client," as is claimed in claim 1.

Displaying a selected portion of the magnified display

Gross fails to teach "displaying in a second display in the browser a selected portion of the magnified display corresponding to a selected portion of the first document," as is recited in amended

sample document chosen from lens bar 130 are displayed within window 105. Lens bar 130 also displays, albeit at a "less" magnified view, the same characters or text displayed within window 105.

Gross, column 10, lines 13-32.

This section of *Gross* explains that the lens portion displays a portion of the document selected by a user in the normal view. As discussed above, the rest of the document is compressed and not legible to the user. Although *Gross* states that lens bar is at a "less" magnified view, when this statement is taken in context, *Gross* is describing the fact that the rest of the document not displayed in the lens portion at the normal size is displayed at the compressed or decreasing size. Moreover, the lens portion does not display a magnified view of a first document, but only displays a selected portion of the document at a normal size as opposed to the compressed or decreasing size. *Gross* does not teach displaying a selected portion of a magnified display of the first document which is generated in memory at the client, in this or any other section of the document. Moreover, displaying a portion of a document in the normal or full size and reducing the size of the remainder of the document is not equivalent to displaying a **magnified** portion of the magnified display because, as discussed above, the lens portion is not a magnified portion of the document.

In addition, even assuming, *arguendo*, that the teachings regarding clicking on a portion of the document to display the selected portion of the lens bar in the lens portion could teach displaying a magnified portion of the document selected by the user in a second display, *Gross* does not teach generating a magnified display of the first document in memory at the client. Therefore, *Gross* cannot teach a selected portion of the magnified display corresponding to the first document. Thus, *Gross* fails to teach "displaying in a second display in the browser a selected portion of the magnified display corresponding to a selected portion of the first document," as is claimed in claim 1.

Mapping the selected portion of the magnified display

Gross fails to teach "mapping the selected portion of the magnified display to a display space of the selected portion of the first document," as is recited in amended independent claim 1. The Examiner alleges this feature is disclosed at column 9, lines 20-38, column 10, lines 56-67 and Figures 6 and 7. The cited portion of *Gross* at column 9 states:

Sample document 123 contains specific string text 124 rendered on the screen by the graphical user interface to stand out from the surrounding text. String text 124 is rendered in a different format. In the example of FIG. 6, string text 124 is rendered as IBM. The different font format of string text 124 is an indication that the text is hyper-linked to "jump" to another document. When a user clicks on string text 124 with a mouse or other pointing device, the graphical user interface shifts the presently viewed sample document 123 to another hyper-linked document. Those skilled in the art will appreciate that sample document 123 can be displayed within a web browser and can

include "links" to other sites within a computer network such as the Internet. However, those skilled in the art can also appreciate that a stand alone document can be displayed within window 104. In other words, window 104 can comprise a graphical user interface window utilized in conjunction with data-processing applications such as word processors or spread sheets.

Gross, column 9, lines 20-38.

Here, *Gross* discloses links to another document. A user can click on the link to view another hyper-linked document. However, linking to another document does not disclose mapping the selected portion of the magnified display to the first document. Linking to a different document does not map a **selected portion** of the magnified display to a display space of the **selected portion** of the first document. Rather, the hyper-link is a link from one document to a different document. *Gross* does not teach linking a **portion** of a document to a portion of another document. Finally, a link is not equivalent to mapping. A link to a different document does not teach mapping a selected portion of a first document to a selected portion of a magnified display of the first document in memory at the client. Rather, a link is generally understood to teach a hyper-link, such as a URL, for retrieving a web page from a server.

The Examiner also cites to the following section of *Gross*:

As described at block 158, a new document is loaded into the working directory of the data-processing system. For example, in the case of a web browser, the web browser can display a "web page" following activation of a hypertext link to that particular web page. The web page can also include additional hypertext links. Those skilled in the art can appreciate, however, that the method described herein need not necessarily be utilized only in association with a web browser. For example, in the case of a word processing application, a document can be loaded into the working directory of the data-processing system and then utilized by the word processing application in association with the method described herein.

Gross, column 10, lines 56-67.

Again, *Gross* describes a link to a web page. Such disclosure does not teach mapping the selected **portion** of the magnified display of the first document in a second display to a display space of the **selected portion** of the first document. Furthermore, the disclosure of a link here does not provide any teaching regarding mapping a portion of a magnified display generated in memory **at the client** with a portion of the first document in a first display in the browser **on the client**.

The Examiner also cites to Figure 6 and 7. Figure 7 is shown above. As discussed above, Figure 7 illustrates a lens portion with a normal view and a remainder of the document shown at an ever decreasing size. Figure 7 does not illustrate a magnified display or mapping a portion of a magnified display to a portion of the first document. Figure 6 illustrates:

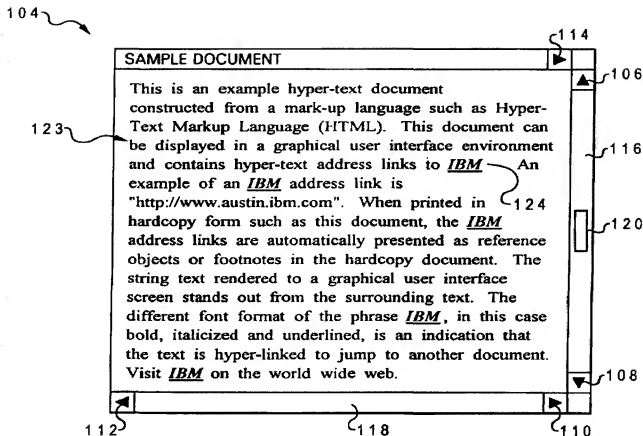


Fig. 6

Gross, Figure 6.

Here, *Gross* depicts a document having a hyper-text link. A link is generally a URL address. However, as discussed above, a link to another document or web page does not disclose mapping a portion of a magnified display to a portion of a first document in the browser on the client. Thus, *Gross* does not disclose “mapping the selected portion of the magnified display to a display space of the selected portion of the first document,” as is claimed in claim 1.

Thus, *Gross* fails to teach each and every feature of independent claim 1. Independent claims 12 and 23 recite similar subject matter. Therefore, independent claims 12 and 23 are distinguishable over *Gross* for the same reasons set forth above with regard to claim 1.

A.2. Dependent Claims 2, 4, 13, 15, and 24

Claims 2, 4, 13, 15, and 24 depend from claims 1, 12, and 23. Therefore, claims 2, 4, 13, 15, and 24 are distinguishable over *Gross* for at least the reasons set forth above with regard to claims 1, 12, and 23. Additionally, claims 2, 4, 13, and 24 claim other additional combinations of features not suggested by the reference.

For example, regarding claims 2, 13, and 24, the Examiner alleges that *Gross* teaches “the action comprises selection of a link within the magnified portion and the step of performing the action comprises retrieving and displaying a second document corresponding to the link in the first display,” at column 9, lines 20-37 which states:

The different font format of string text 124 is an indication that the text is hyper-linked to “jump” to another document. When a user clicks on string text 124 with a mouse or other pointing device, the graphical user interface shifts the presently viewed sample document 123 to another hyper-linked document.

Here, *Gross* merely describes a link in a sample document. The sample document is a scrollable document that is too long to display on a single page. Therefore, a scroll bar is provided to allow the user to scroll up or scroll down to view different parts of the document. *Gross* teaches:

In the example of FIG. 6, because sample document 123 includes too many pages to view simultaneously, the user can position a mouse cursor over up-arrow section 106 or down-arrow section 108 of scroll bar 116 and click a pointing device (e.g., a mouse) to scroll the sample document 123 upward or downward, as appropriate. Scroll bar 116 thus provides a scrolling function. “Scrolling,” well known in the art of graphical user interface icons, is the process of moving a document in a window such as window 104 to permit viewing of any desired portion. “Scrolling” is so named because it is the electronic equivalent of reading through a rolled or scrolled document rather than flipping through the pages of a book. Scrolling can also be accomplished utilizing “PgUp” and “PgDn” keys commonly included on computer keyboards such as keyboard 26 depicted in FIG. 1. A horizontal scroll bar 118 includes arrow sections 112 and 110 for scrolling sample document 123 respectively left or right. Also, an optional arrow section 114 allows a user to scroll the document right. Thus, the graphical user interface that contains window 104 and sample document 123 is a type of computer display format that enables a user to choose commands, start programs, and see lists of files and other options by pointing to pictorial representations (i.e., icons) and lists of menu items on the screen. Choices can generally be activated either with a keyboard or a mouse.

Gross, column 8, line 61-column 9, line 19.

Although *Gross* discloses a link in a document, *Gross* does not disclose “**a link within the magnified portion**”. In fact, as discussed above, the document having the link described by *Gross* does not even have a magnified portion of the document. Let alone a link in a magnified portion that is selected and displaying a second document corresponding to the link in the magnified portion of the document.

The Examiner also cites to *Gross* at column 10, lines 13-30 which is quoted above. As discussed above, the lens bar displays the document in a decreased size. A lens portion displays a part of the document at a normal size or normal view. A user clicks on a portion of the compressed document in the lens bar so that the portion clicked on will be displayed at normal size or normal view in the lens portion.

Not only does this fail to teach selection of a link in the magnified portion and displaying a second document corresponding to the link, these teachings appear to be the opposite of the present invention in claim 2 where *Gross* teaches compressing portions of the document and then restoring the normal view for a part of the document when a user clicks on that portion of the document. Therefore, *Gross* fails to teach each and every feature of claim 2, 13, and 24.

Regarding claims 4 and 15, the Examiner believes that *Gross* discloses mapping the magnified display to a display space comprising mapping the magnified portion to the first document to form an imagemap at column 9, lines 20-38, column 10, lines 56-67, and Figures 6 and 7. These cited portions of *Gross* and the figures are shown above. These cited portions of *Gross* fail to teach mapping the magnified portion of the first document for the same reasons set forth above with regard to claim 1. In addition, *Gross* fails to disclose an image map in this or any other section of the reference. Consequently, it is respectfully urged that the rejection of claims 2, 4, 12, 13, and 24 have been overcome.

B. 35 U.S.C. § 103, Alleged Obviousness, Claims 5-7 and 16-18

The Examiner rejects claims 5-7 and 16-18 under 35 U.S.C. § 103 as being allegedly obvious over *Gross et al.* (US 6,044,385, issued 03/28/2000) in view of *Guedalia* (US 6,121,970, issued 09/19/2000). The rejection is respectfully traversed.

As discussed above, *Gross* does not teach or suggest the features of independent claims 1, 12, and 23. In addition, *Guedalia* fails to make up for the deficiencies of *Gross*. *Guedalia* is directed towards archiving digital data on a server computer and enabling a user to view digital images from the digital data. *Guedalia* provides a view window partitioned into a plurality of sub-regions. A user can select a sub-region. In response, the server sends a new or modified HTML page to the client corresponding to the selected location. However, *Guedalia* does not teach or suggest magnifying a portion of a document in a browser on a client. Therefore, *Guedalia* does not make up for the deficiencies of *Gross*.

Moreover, a person of ordinary skill in the art would not have found it obvious to modify and combine *Gross* with *Guedalia* in view of the scope and content of the prior art. As discussed above, when *Gross* is considered as a whole, *Gross* teaches one of ordinary skill in the art to compress or shrink the contents of a document so that an entire large document can be displayed in the display window. In contradistinction, the present invention in claims 5-7 and 16-18 is directed to solving the problem of users that have difficulty reading or seeing text on a page.

Visually impaired users may find it difficult to locate links in documents with small print. Other users may have difficulty with fine motor movements and cannot

manipulate a mouse pointer with accuracy, thus making it difficult to select links in a crowded portion of the page. Magnifiers exist that allow a user to select a portion of a web page and generate a magnified display of that portion. However, after a link is located in the magnified display, the user must return to the browser to locate and select the link. Therefore, a user with visual impairment or difficulty with fine motor movements still faces the problem of locating and selecting the link in the original display.

Specification, page 2, lines 15-27.

The present invention in claims 5-7 and 16-18 solves this problem by magnifying a portion of a document in a browser on a client while maintaining browser functionality. In contradistinction, *Gross* is directed towards solving the problem of displaying a long document on a single display screen. *Gross* teaches:

A problem associated with this type of "scrolling" either in Internet based systems or independent computer systems which utilize graphical user interface devices, is that documents are often too long to fit within a graphical user interface window, well known in the art of data-processing systems. Scroll bars give some sense of the global length of a document displayed within a graphical user interface window, such as a web page, and allow a user to navigate fairly easily through such documents. However, scroll bars lack the ability to allow the user to comprehend how much information is actually located prior to or after a currently displayed portion of the web page or document. Such scroll bars also do not give the user a sense of how this information is "laid out" within the entire document.

Gross, column 3, lines 5-18.

Gross addresses the problem of displaying a long document in a window that a user can get a sense of how the information in the document is laid out. *Gross* does not teach or suggest any problem for which magnifying a portion of a document in a browser would be a solution. In fact, *Gross* seems to be directed to a completely different problem of compressing of fitting more content into a smaller space rather than the problem of difficulty reading and utilizing links in documents. Moreover, the solution provided by *Gross* is not only completely different from the solution provided by claims 5-7 and 16-18, but the differing solutions would work at odds to each other if both the solution of *Gross* and the solution of the present invention in claims 5-7 and 16-18 were implemented together because *Gross* compresses document text and links to accommodate more content in a small display space while the present invention magnifies content and performs actions requested in the magnified content to make the content of a document easier to see and perform actions with regard to the magnified content. Therefore, *Gross* not only fails to recognize the problem solved by the invention in claims 5-7 and 16-18, but the solution of *Gross* would only exacerbate the problem that the invention in claims 5-7 and 16-18 is directed to solving.

In addition, *Guedalia* is directed to the problem of interactive viewing of images on the Internet.

Guedalia teaches:

The drawback with this client-less approach to image navigation is that it is very processing-heavy on the server side. For every interactive user command, the server has to render a customized image to embed in the dynamic HTML page. Given the rapid pace with which interactive user commands are issued, this puts a heavy burden on the server, greatly slowing down its performance. Moreover the combined latency of the server processing and the network communication makes the user experience a "bumpy" rather than a "smooth" interactive experience; i.e. the navigation experience appears more like a slide show than a continuous animation.

Guedalia, column 3, lines 45-57.

Thus, *Guedalia* is directed to interactive image navigation in a client-less approach. *Gross* and *Guedalia* are directed to different problems, displaying large documents in a single window and image navigation in a client-less approach. The references provide no reason for a person of ordinary skill in the art to combine *Gross* and *Guedalia* and modify the references in the manner necessary to reach the invention in claims 5-7 and 16-18.

The Examiner suggests that it would have been obvious to combine *Guedalia* and *Gross* because it would have provided the capability for significantly less re-use of the same image portion. However, less re-use of the same image portion is not a motivation for combining and modifying *Guedalia* and *Gross* to magnify a portion of a document in a browser on a client. The Examiner has not provided any explanation as to how less re-use of the same image would motivate magnification of a portion of a document.

In addition, even if the references could be combined, the combination of the references would not form the presently claimed invention in claims 5-7 and 16-18. *Gross* teaches compressing or decreasing the size of portions of a document in a window. See *Gross* Abstract. *Guedalia* teaches a window being partitioned into a plurality of imaginary sub-regions. See *Guedalia* Abstract. However, neither reference teaches or suggests generating a magnified display of a first document and displaying a selected portion of the magnified display in a second display in the browser. Thus, a combination of the cited references would result in providing a plurality of sub-regions in the compressed display space.

Finally, the references are not properly combinable or modifiable if their intended function is destroyed. A *prima facie* case of obviousness cannot be properly based upon prior art reference if the prior art reference requires some modification in order to meet the claimed invention and such modification destroys the intended purpose or function of the disclosed invention. As discussed above, *Gross* is directed towards solving the problem of displaying a long document in a single window. *Gross* solves this problem by compressing or decreasing the size of a portion of the document. If *Gross* is

modified to magnify a portion of the document as is claimed in claim 1, the function of *Gross* would be destroyed because magnifying a portion of the document would make it more difficult to display the entire document in a window rather than enabling the entire document to be displayed in the window. Therefore, the presently claimed invention can only be reached through an improper use of the disclosed invention as a template to modify the prior art to reach the claimed invention. Therefore, the rejection of dependent claims 5-7 and 16-18 under 35 U.S.C. § 103 has been overcome.

C. 35 U.S.C. § 103, Alleged Obviousness, Claims 8-9, 11, 19-20, 22, and 25-26

The Examiner rejects claims 8-9, 11, 19-20, 22, and 25-26 under 35 U.S.C. § 103 as being allegedly obvious over *Gross et al.* (US 6,044,385, issued 03/28/2000) in view of *Szepesvary et al.* (US 2003/0192026). The rejection is respectfully traversed.

In order to establish a *prima facie* case of obviousness under 35 U.S.C. § 103, *Graham v. John Deere Co. of Kansas City*, 383 U.S. 1 (1966) requires determining, respectively, the scope and content of the prior art, the differences between the prior art and the claims at issue, and the level of ordinary skill in the pertinent art. Also, the prior art or combined references must teach or suggest all of the claim limitations. In the present case, the Examiner has failed to establish a *prima facie* case of obviousness because not all of the features of the claimed invention have been properly considered, and the teachings of the references themselves do not teach or suggest the claimed subject matter to a person of ordinary skill in the art. Independent amended claim 8 claims as follows:

8. A method for magnifying a portion of a document in a browser, comprising:
 - presenting a first document in a first display in the browser;
 - receiving a selection of a portion of the first document;
 - generating a magnified display of the selected portion from the structure of the first document;
 - analyzing a document object model for the first document;
 - identifying a portion of the document object model that corresponds to the selected portion of the first document, wherein the magnified display of the selected portion of the first document is generated at a client based on the corresponding portion of the document object model for the first document;
 - presenting the magnified display;
 - receiving a request for an action within the magnified display; and
 - performing the action with respect to the magnified display.

Claims 19 and 25 recite similar subject matter. Independent claims 8, 19, and 25 recite some similar subject matter addressed above with regard to independent claims 1, 12, and 23. Thus, the same distinctions between the cited prior art references and claim 1 discussed above are applicable to independent claims 8, 19, and 25 with regard to the similarly recited subject matter.

As discussed above, *Gross* fails to teach generating a magnified display of a portion of a first

document. In addition, the Examiner acknowledges that *Gross* does not teach analyzing a document object model for the first document. However, the Examiner believes *Szepesvary* teaches this feature at paragraphs 0034-0036. *Szepesvary* teaches as follows:

[0034] To this end, illustrated scanner module 22 traverses the DOM and creates one or more tokens for each element encountered. The process involves grouping sequences of attributes from the HTML DOM into units (tokens) to create a mapping between the DOM elements and the tokens. The generated tokens, which represent the DOM elements, are then passed to the parser 24.

[0035] The tokenized input is interpreted by the parser 24 according to an application specific grammar, to identify and distinguish among the various portions of the application's display. For example, recognizing interactive objects as distinct from textual titles, metatags, unprintable HTML, in-line pictures, etc. The parser can achieve this by grouping the tokens into syntactic structures that identify items displayed in the HTML application. The parser 24 then outputs user interface objects 26 that correspond to graphical elements and other items displayed by the browser.

[0036] FIG. 2 is a flow chart 28 that depicts various steps for implementing this exemplary embodiment of the method of the invention. In step 30, the DOM of a specific application is analyzed and an application-specific grammar is defined. It is important to note that the defined grammar is not a generic grammar for all HTML DOM applications, rather, the defined grammar is specific to a particular application only.

Szepesvary, paragraphs 0034-0036.

Here, *Szepesvary* discloses mapping between DOM elements and tokens that represent the DOM elements. However, *Szepesvary* does not disclose analyzing a document object model for a first document; identifying a portion of the document object model that corresponds to the selected portion of the first document, wherein the magnified display of the selected portion is generated at a client based on the corresponding portion of the document object model for the first document. Moreover, even assuming *arguendo*, that *Szepesvary* does disclose analyzing a document object model for the first document, *Szepesvary* does not teach or suggest magnifying a portion of a document in a browser. Therefore, *Szepesvary* fails to make up for the deficiencies of *Gross*.

Thus, *Gross* and *Szepesvary*, either alone or in combination, fail to teach or suggest each and every feature recited in independent claim 8. Thus, any alleged combination of the prior art of reference cannot render obvious the claimed features generating a magnified display of a first document in memory at a client and mapping the selected portion of the magnified display to the selected portion of the first document such that receiving a request for a first action in the second display would permit performing the action with respect to the first document because the cited references fail to teach or suggest each and every feature of claim 8.

The Examiner alleges it would have been obvious to one having ordinary skill in the art at the time the invention was made to include the feature from *Szepesvary* in the system of *Gross* because it

would have provided the capability for recognizing user interface object in HTML applications, as well as for creating computer programs that accept HTML Document Object Model structures as input. However, generally and broadly stating that combining the features of *Szepesvary* with *Gross* to recognize user interface object in HTML applications does not provide a suggestion or reason for a person of ordinary skill in the art to combine and modify the cited references as necessary to reach the presently claimed invention. The Examiner has not explained how the recognizing user interface object in HTML applications would make it obvious to combine the cited references to generate a magnified display of a portion of a document, as is claimed in claim 8.

Furthermore, neither *Gross* or *Szepesvary* teach, suggest, or given any reason to analyze a document object model for a first document and identify a portion of the document object model that corresponds to the selected portion of the first document, wherein a magnified display of the selected portion of the first document is generated at the client based on the corresponding portion of the document object model for the first document in any portion of the reference.

A person of ordinary skill in the art would not be motivated to combine and modify the cited references with the changes proposed by the Examiner when the scope and content of the prior art is considered in its entirety. "It is impermissible within the framework of section 103 to pick and choose from any one reference only so much of it as will support a given position, to the exclusion of other parts necessary to the full appreciation of what such reference fairly suggests to one of ordinary skill in the art." *In re Hedges*, 228 U.S.P.Q. 685, 687 (Fed. Cir. 1986). The present invention recognizes the problem encountered by users that are visually impaired and/or have difficulty with fine motor movements locating and selecting links on a web page. *Gross* does not recognize this problem. Instead, *Gross* is directed towards problems associated with displaying long or large documents in a window at the same time. See *Gross* at column 3, lines 5-18, shown above. *Gross* overcomes this problem by decreasing the size or compressing the display so that the entire document will fit in the window. As a result, information farthest from the localized view will appear smallest to the user. See *Gross* at column 10, lines 10-12, shown above. Thus, when *Gross* is examined as a whole, *Gross* teaches one of ordinary skill in the art to make a display smaller or more difficult for a user to see and read. In fact, as shown in Figure 7 and 8 above, the compressed portion of the display is not legible to a user. Thus, one of ordinary skill would not be motivated make the Examiner's proposed modifications to reach the presently claimed invention when *Gross* is considered as a whole.

Moreover, even if it was proper to combine the cited references, the combination of the references would not form the presently claimed invention. As discussed above, *Gross* teaches compressing or decreasing the size of portions of a document, which teaches away from the presently

claimed invention in claim 8 which magnifies a portion of a document in a browser. Moreover, *Szepesvary* does not teach magnifying a document or any portion of a document. Rather, *Szepesvary* teaches recognizing graphical user interface objects in HTML applications. *Szepesvary* teaches:

The present invention provides methods and system for building a computer program, such as a dynamically linked library, capable of recognizing graphical user interface objects in HTML applications. The program accepts HTML DOM structures as input and processes the DOM by 1) creating one or more tokens for each parsed DOM element, and 2) parsing the generated tokens according to an application specific grammar. The program outputs user-interface objects that correspond to the graphical elements and other items displayed in the web browser.

Szepesvary, Abstract.

Thus, a combination of *Gross* and *Szepesvary* would result in compressing a document and outputting user-interface objects corresponding to the graphical elements and other items displayed in the compressed web page. The combination of the references would not result in magnifying a portion of a document in a browser as is claimed in claim 8.

In fact, because *Gross* actually teaches away from the presently claimed invention since *Gross* directs one to compress or decrease the size of portions of a document rather than magnify a portion of a document, any combination of the cited references would result in compressing or shrinking the content of a document, which would not only fail to reach the invention in claim 8 but would exacerbate the problem experienced by users that are visually impaired and/or users that have difficulty with fine motor movements by making the content of a document even more difficult to see and more difficult to select links in an even more crowded portion of the document page.

Thus, the presently claimed invention in claims 8, 19, and 25 are not obvious over *Gross* in view of *Szepesvary*. In addition, dependent claims 9, 11, 22, and 26 depend from claims 8, 19, and 25. Therefore, claims 9, 11, 22, and 26 are not obvious over the cited prior art references at least by virtue of their dependency. Therefore, the rejection of claims 5-7 and 16-18 under 35 U.S.C. § 103 has been overcome.

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CLAIMS APPENDIX

The text of the claims involved in the appeal are:

1. A method for magnifying a portion of a document in a browser on a client, comprising:
presenting a first document in a first display in the browser on the client;
generating a magnified display of the first document in memory at the client;
displaying in a second display in the browser a selected portion of the magnified display
corresponding to a selected portion of the first document;
mapping the selected portion of the magnified display to a display space of the selected
portion of the first document; and
responsive to receiving a request for an action within the second display, performing the
action with respect to the first document.
2. The method of claim 1, wherein the action comprises a selection of a link within the
magnified portion and the step of performing the action comprises retrieving and displaying a
second document corresponding to the link in the first display.
4. The method of claim 1, wherein the step of mapping the magnified display to a display
space comprises mapping the magnified portion to the first document to form an imagemap.
5. The method of claim 1, wherein the step of generating a magnified display of the first
document comprises:
creating the second display, wherein the second display has a magnified display space based

on a magnification factor;

reading pixels from video memory for the magnified portion in a normal display space for the original first document; and

populating pixels in the second display to form a magnified display.

6. The method of claim 5, wherein the step of populating pixels in the second display comprises for each pixel of the normal display space, populating adjacent pixels based on the magnification factor.

7. The method of claim 5, wherein the step of mapping the magnified display to a display space comprises mapping a magnified display space for the magnified portion to corresponding pixels in a normal display space for the original first document.

8. A method for magnifying a portion of a document in a browser, comprising:

presenting a first document in a first display in the browser;

receiving a selection of a portion of the first document;

generating a magnified display of the selected portion from the structure of the first document;

analyzing a document object model for the first document;

identifying a portion of the document object model that corresponds to the selected portion of the first document, wherein the magnified display of the selected portion of the first document is generated at a client based on the corresponding portion of the document object model for the first document;

presenting the magnified display;
receiving a request for an action within the magnified display; and
performing the action with respect to the magnified display.

9. The method of claim 8, wherein the action comprises a selection of a link within the magnified display and the step of performing the action comprises retrieving and displaying a second document corresponding to the link in the first display.

11. The method of claim 8, further comprising:
adjusting attributes of nodes in the portion of the document object model based on a magnification factor.

12. An apparatus for magnifying a portion of a document in a browser, comprising:
first presentation means for presenting a first document in a first display in the browser on a client;
generating means for generating a magnified display of the first document in memory at the client;
displaying means for displaying in a second display in the browser a selected portion of the magnified display corresponding to a selected portion of the first document;
mapping means for mapping the selected portion of the magnified display to a display space of the selected portion of the first document; and
performing means for, in response to receiving a request for an action within the second display, performing the action with respect to the first document.

13. The apparatus of claim 12, wherein the action comprises a selection of a link within the magnified portion and the performing means comprises means for retrieving and displaying a second document corresponding to the link in the first display.

15. The apparatus of claim 12, wherein the step of mapping means for mapping the magnified display to a display space comprises means for mapping the magnified portion to the first document to form an imagemap.

16. The apparatus of claim 12, wherein the generating means comprises:

creation means for creating the second display, wherein the second display has a magnified display space based on a magnification factor;

reading means for reading pixels from video memory for the magnified portion in a normal display space for the first original document; and

population means for populating pixels in the second display to form a magnified display.

17. The apparatus of claim 16, wherein the population means comprises means for populating adjacent pixels based on the magnification factor for each pixel of the normal display space.

18. The apparatus of claim 16, wherein the mapping means comprises means for mapping pixels in the magnified display space to corresponding pixels in the normal display space.

19. An apparatus for magnifying a portion of a document in a browser, comprising:

- first presentation means for presenting a first document in a first display in the browser;
- first receipt means for receiving a selection of a portion of the first document;
- magnification means for generating a magnified display of the selected portion from the structure of the first document;
- analysis means for analyzing a document object model for the first document;
- identification means for identifying a portion of the document object model that corresponds to the selected portion of the first document, wherein the magnified display of the selected portion of the first document is generated at a client based on the corresponding portion of the document object model for the first document;
- second presentation means for presenting the magnified display;
- second receipt means for receiving a request for an action within the magnified display; and
- performing means for performing the action with respect to the magnified display.

20. The apparatus of claim 19, wherein the action comprises a selection of a link within the magnified display and the performing means comprises means for retrieving and displaying a second document corresponding to the link in the first display.

22. The apparatus of claim 19, further comprising:

- adjustment means for adjusting attributes of nodes in the portion of the document object model based on a magnification factor.

23. A computer program product, in a tangible computer readable storage medium, for magnifying a portion of a document in a browser, comprising:

instructions for presenting a first document in a first display in the browser on a client;

instructions for generating a magnified display of the first document in a memory at the client;

instructions for displaying in a second display in the browser a selected portion of the magnified display corresponding to a selected portion of the first document;

instructions for mapping the selected portion of the magnified display to a display space of the selected portion of the first document; and

instructions for, in response to receiving a request for an action within the second display performing the action with respect to the first document.

24. The computer program product of claim 23, wherein the action comprises a selection of a link within the magnified portion and the instructions for performing the action comprises instructions for retrieving and displaying a second document corresponding to the link in the first display.

25. A computer program product, in a computer readable storage medium, for magnifying a portion of a document in a browser, comprising:

instructions for presenting a first document in a first display in the browser;

instructions for receiving a selection of a portion of the first document;

instructions for generating a magnified display of the selected portion from the structure of the first document;

instructions for analyzing a document object model for the first document;

instructions for identifying a portion of the document object model that corresponds to the selected portion of the first document, wherein the magnified display of the selected portion of the first document is generated at a client based on the corresponding portion of the document object model for the first document;

instructions for presenting the magnified display;

instructions for receiving a request for an action within the magnified display; and

instructions for performing the action with respect to the magnified display.

26. The computer program product of claim 25, wherein the action comprises a selection of a link within the magnified display and the instructions for performing the action comprises instructions for retrieving and displaying a second document corresponding to the link in the first display.

EVIDENCE APPENDIX

There is no evidence to be presented.

RELATED PROCEEDINGS APPENDIX

There are no related proceedings.